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July 15, 2004

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

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Federal Communications Commission
Office of Secretary

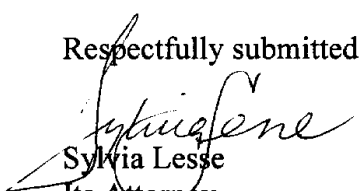
Re: MobileTel, LLC
CC Docket No. 94-102
E911 Phase II Interim Implementation Report

Dear Ms Dortch:

Pursuant to the Commission's Order to Stay,¹ MobileTel, LLC hereby submits its E911 Phase II Interim Implementation Report to assist the Commission in monitoring the company's progress in deploying Phase II E911 technology.

Please contact the undersigned if you have any questions regarding this report.

Respectfully submitted,


Sylvia Lesse
Its Attorney

Enclosure

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List ABCDE

cc: John Muleta, Chief, Wireless Telecommunications Bureau
David Solomon, Chief, Enforcement Bureau
D'wana Terry, Chief, Public Safety & Critical Infrastructure Division
Eugenie Barton, Public Safety & Critical Infrastructure Division
Best Copy & Printing, Inc.
Mark J. Boudreaux, Terrebonne Parish Communications District

¹

See In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers: Order to Stay, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

MOBILETEL, LLC
E911 PHASE II INTERIM IMPLEMENTATION REPORT
FOR TIER III CARRIERS
Second Quarter, 2004

MobileTel, LLC ("MobileTel" or "Company"), pursuant to the Commission's Order to Stay,¹ hereby provides an interim report to assist the Commission in monitoring MobileTel's progress in deploying Phase II E911 technology.²

I. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):

MobileTel has received valid Phase I requests from Lafourche, St. Mary and Terrebonne parishes and, pursuant to those requests, provides Phase I service to these parishes. The Company has not received a Phase I request from the other jurisdiction that the Company serves, Grand Isle. MobileTel received a Phase II request from one of these jurisdictions, Terrebonne Parish, on July 6, 2004.

II. The carrier's specific technology choice:

As reported, the Company has determined that a network-based Phase II solution is not economically or technically feasible. Accordingly, the Company is converting its analog/TDMA system to a CDMA network that supports a handset-based solution.³

III. Status on ordering and/or installing necessary network equipment:

As previously reported, the Company has made significant progress in converting its system to CDMA,⁴ although phase completion dates have been extended nominally. The Company reports that it likely will begin marketing CDMA service in the majority of its service area in January, 2005 to accommodate the revised construction schedule, thus ensuring minimal customer confusion. By year-end, the Company believes that its CDMA overlay in Terrebonne

¹ See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers: Order to Stay*, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

² On August 1, 2003, MobileTel requested a limited and temporary waiver of the Commission's Phase II obligations ("Petition") and filed an E911 Phase II Interim Report for Tier III Carriers ("First Report"). In its Petition, MobileTel committed to providing quarterly progress reports. On November 10, 2003, MobileTel supplemented the Petition with updated information to further substantiate its request. See Supplement to Petition for Waiver of Section 20.18 of the Commission's Rules, CC Docket No. 94-102, filed Nov. 10, 2003 ("Supplement"), and filed a quarterly report on January 15, 2004 and April 15, 2004. Accordingly, this instant report serves as the Company's fourth quarterly progress report.

³ The Company reports that it has expanded its negotiations with prospective vendors to include two additional prospective suppliers, bringing the total number of proposals for Phase I and Phase II CDMA solutions to three. Pending action on the Company's analog/TDMA waiver request, a contract will be finalized.

⁴ See Supplement at 2.

and Lafourche parishes will be completed, and the St. Mary Parish construction is now scheduled for completion during the first half of 2005.

In anticipation of completion of the conversion of its network to CDMA, MobileTel has initiated the development of a subscriber educational campaign to encourage analog/TDMA customers to transition to CDMA ALI-capable phones. Through these efforts, the Company anticipates that most of its customers will have migrated to CDMA ALI-capable phones by the end of 2007. MobileTel hereby provides further details regarding this campaign:

1. Continuation of on-going efforts to transition customers from analog to digital.
As part of MobileTel's existing marketing efforts, the Company continues its efforts to convert its analog customers to digital technologies. Among the activities directed toward this goal are continuations of programs previously reported: (1) Company representatives encouraging analog customers to switch to digital when the customers call in to discuss issues related to their service; and (2) pricing digital calling plans lower than analog plans. In addition, the company reports two additional efforts undertaken this quarter: (1) initiation of an active "trade up" marketing campaign, focused on analog phones (utilizing the slogan, "trade in that clunky old phone"); and (2) a focused outbound phone campaign designed to educate existing analog users and to promote a transition to digital technologies. These efforts have resulted in an additional one percent reduction of analog users over the past three month period.⁵
2. Marketing Campaign
As noted above, MobileTel has already undertaken an active marketing plan designed to move existing analog subscribers to TDMA. The Company intends to continue that effort in the coming months. After the CDMA system has been fully deployed in 2005, the Company will initiate a marketing campaign which continues to target its analog and TDMA customers with direct mailings and print advertising. The marketing efforts would emphasize that location information will not be available to emergency service providers unless the customers transition to CDMA ALI-capable phones. Customers that still have analog handsets will continue to be the subject of specific and targeted efforts emphasizing the additional benefits of digital service.
3. Incentives to Convert to CDMA ALI-Capable Phones
Consideration is also being given to providing a rebate or other benefit to customers who turn in their analog or TDMA handset and purchase a CDMA phone. The Company plans to cease sales of analog phones to the general public once the CDMA network is fully deployed and tested.⁶

⁵ The Company reports that the of 10.26% of all customers currently utilizing analog technology reported on April 15, 2004 has decreased further to 8.35%, representing a 18.6% decrease during the second quarter.

⁶ The Company may continue to sell analog phones to public safety officials who may require the larger coverage area that analog provides and to those who use the phones off-shore where there is no digital service.

IV. Information Regarding Availability of ALI-Capable Handsets

Because MobileTel does not plan to begin marketing its CDMA service until early 2005, it has not begun ordering CDMA ALI-capable handsets. MobileTel is aware, however, that ALI-capable handsets are available for CDMA networks and anticipates that more models will be available when it begins to actively market CDMA phones.

V. The estimated date on which Phase II service will first be available in the carrier's network:

MobileTel reports that the anticipated date that it will begin selling and activating ALI-capable CDMA is February 1, 2005 (updated to conform to revised construction schedule). MobileTel continues to coordinate with the PSAPs in its service area regarding their plans to begin receiving Phase II information.

DECLARATION OF JAMES CALLAHAN

I, James Callahan, President of MobileTel, LLC, do hereby declare under penalty of perjury that I have read the foregoing "MobileTel, LLC E911 Phase II Implementation Report for Tier III Carriers, Second Quarter, 2004" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

July 13, 2004
Date

James Callahan
James Callahan